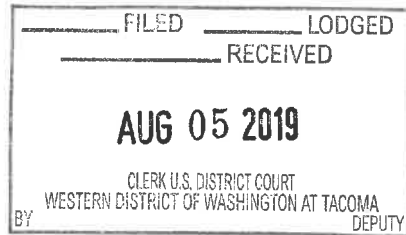


Hon. David W. Christel



UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff

v.

LUIS MORENO-LUNA, and
MANUEL FLORES-ESTRADA

Defendants.

CASE NO. *MJ19-5144*

COMPLAINT for VIOLATION

Title 21, United States Code,
Sections 841(a)(1) and 841(b)(1)(A), and
Title 18, United States Code, Section 2

BEFORE the Honorable David W. Christel, United States Magistrate Judge,
Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Possession with Intent to Distribute Controlled Substances)

On or about August 1, 2019, at Grays Harbor County, within the Western District
of Washington and elsewhere, LUIS MORENO-LUNA and MANUEL FLORES-
ESTRADA did knowingly possess, with the intent to distribute, and aid and abet the
possession of with the intent to distribute, substances controlled under Title 21, United
States Code, Section 812, Schedule I and II, including, but not limited to, heroin and
methamphetamine.

1 It is further alleged that this offense involved one kilogram and more of a mixture
2 and substance containing a detectable amount of heroin.

3 It is further alleged that this offense involved 500 grams and more of a mixture
4 and substance containing a detectable amount of methamphetamine.

5 All in violation of Title 21, United States Code, Sections 841(a)(1) and
6 841(b)(1)(A), and Title 18, United States Code, Section 2.

7 I, Colin Fine, being first duly sworn on oath, depose and say:

8 **AFFIANT BACKGROUND AND EXPERIENCE**

9 1. I am a Special Agent with the Drug Enforcement Administration (DEA),
10 United States Department of Justice, and have been so employed since April 2017. In
11 that capacity, I investigate violations of the Controlled Substances Act (Title 21, United
12 States Code, Section 801, et seq.). I am currently assigned to the Seattle Field Division,
13 Tacoma Resident Office. My training and experience includes, but is not limited to, a
14 twenty-week course at the DEA academy in Quantico, Virginia. At the DEA academy, I
15 was trained in all aspects of conducting narcotics investigations to include debriefing
16 defendants, witnesses, and informants, conducting surveillance, executing search
17 warrants, conducting controlled deliveries, utilizing law enforcement, open source, and
18 social media databases, and seizing narcotics and narcotics-related assets. I am familiar
19 with investigations of drug trafficking organizations, methods of importation and
20 exportation, distribution, and smuggling of controlled substances, and financial and
21 money laundering investigations. I have participated in investigations involving
22 organizations trafficking in controlled substances, including heroin, and such
23 investigations have resulted in the arrests of drug traffickers and seizures of controlled
24 substances. I have participated in the execution of drug search warrants and have
25 personally been involved in the seizure of controlled substances. Based on my training,
26 experience and conversations with other experienced narcotics investigators, I have
27 gained experience in the techniques and methods used by drug traffickers to distribute
28

1 controlled substances. Prior to my employment with DEA, I served 12 years on active
2 duty in the United States Marine Corps, achieving the rank of Gunnery Sergeant.

3 **BACKGROUND**

4 2. I am providing the information in this affidavit both from my personal
5 observations and knowledge, and from information obtained from other law enforcement
6 officers and agents participating in this investigation. I am not providing all information
7 about this investigation, but rather information in a summary fashion that I believe is
8 pertinent to a fair determination of probable cause.

9 **SOURCES OF INFORMATION**

10 3. This investigation is being conducted by the Drug Enforcement
11 Administration (DEA) Tacoma Resident Office, the Lewis County Joint Narcotics
12 Enforcement Team (JNET), and the Grays Harbor Drug Task Force (GHDTF). I have
13 participated with other agents and law enforcement officers involved in the investigation.

14 4. The facts set forth in this affidavit arise from my personal and direct
15 participation in the investigation, my experience and training as a DEA Special Agent,
16 my conversations with witnesses and other law enforcement personnel participating in
17 this and related investigations, and my review of relevant documents and reports. I have
18 obtained and read reports prepared by various law enforcement officers participating in
19 this investigation, and in the other investigations discussed, including but not limited to
20 Special Agents and Task Force Officers with DEA, detectives and officers from JNET,
21 the GHDTF, and other various departments or agencies, confidential sources, and other
22 sources of information. When I refer to the criminal history of a subject, I have read the
23 available criminal history from state or federal agencies.

24 **CONFIDENTIAL SOURCES**

25 5. This investigation utilized the assistance of a confidential source ("CS").
26 For the purpose of this affidavit, I will include information from the confidential source,
27 discussed below, who will be referred to as the CS. The information provided by the CS
28 to date has been timely and accurate. Investigators believe that the information provided

1 by the CS has been truthful and credible based on corroboration during the course of the
2 investigation, as described below.

3 6. The CS is working for monetary considerations. In exchange for working
4 with law enforcement, CS has also received assistance in quashing a misdemeanor
5 warrant. The CS has been involved in the illicit drug trade for more than five years. The
6 CS has been a user of narcotics. The CS also has three felony convictions from more
7 than a decade ago. The CS cooperated with law enforcement out of concerns for his/her
8 community and has been provided monetary compensation of information provided to
9 law enforcement. Investigators believe that the CS has been honest and forthcoming to
10 investigators regarding the CS's involvement and knowledge of illicit drug trafficking
11 within Grays Harbor County, Washington and elsewhere.

12 THE INVESTIGATION

13 7. Beginning in early 2018, agents from DEA Tacoma received information
14 about MARIA LUISA GARCIA-VALENZUELA. According the investigation and
15 initial information from sources of information, GARCIA-VALENZUELA is a large-
16 scale methamphetamine and heroin trafficker operating in the Tacoma, Washington area.
17 Furthermore, through the course of the investigation law enforcement learned that
18 GARCIA-VALENZUELA was involved in transporting large shipments of
19 methamphetamine and heroin in passenger vehicles from Phoenix, Arizona, to the state of
20 Washington, where she distributed the drugs in Pierce County and Grays Harbor County.

21 8. According to the CS, approximately three years ago, the CS met at least
22 two drug traffickers who sold drugs supplied by GARCIA-VALENZUELA. According
23 to the CS, the CS has met GARCIA-VALENZUELA and has sold drugs that the CS
24 purchased from GARCIA-VALENZUELA's drug trafficking organization (DTO). In
25 this manner, the CS gained first-hand knowledge of the inter-dealings of GARCIA-
26 VALENZUELA's DTO. According to the CS, GARCIA-VALENZUELA lived in
27 Tacoma, Washington, with her wife, ALONDRA ESPINOZA-ARMENTA, with whom
28 GARCIA-VALENZUELA coordinated the shipment of drugs to the state of Washington

1 from Arizona and California. According to the CS, GARCIA-VALENZUELA kept
2 drugs and drug proceeds at her house on South J Street in Tacoma, Washington.
3 According to the CS, drugs and drugs proceeds were buried in a metal box in GARCIA-
4 VALENZUELA's yard.

5 9. On June 20, 2019, law enforcement executed a federal search warrant on
6 the South J Street residence and arrested GARCIA-VALENZUELA, ALONDRA
7 ESPINOZA-ARMENTA and some of their associates.¹ Law enforcement found
8 approximately 2.5 kilograms of heroin and approximately \$50,000 in drug proceeds
9 buried at the South J Street residence, as the CS had stated.

10 10. Following the arrests on June 20, 2019, the CS told investigators that
11 ALONDRA ESPINOZA-ARMENTA's brother, REY ARTURO ESPINOZA-
12 ARMENTA, is in Mexico and plans to take over the narcotics business in Grays Harbor
13 County and elsewhere.

14 11. On July 30, 2019, the CS informed law enforcement that REY ARTURO
15 ESPINOZA-ARMENTA was sending a large shipment of narcotics to western
16 Washington. According to the CS, the narcotics were being transported by at least one
17 individual known as "Luis," and Luis was driving a 2008 blue Chevrolet Silverado. The
18 CS also stated that the individuals transporting the drugs were using two telephone
19 numbers, including one ending in 1610. The CS specifically stated that the Silverado
20 would be traveling westbound along Highway 8 in the direction of Aberdeen,
21 Washington, between 5:30 pm and 7:00 pm on August 1, 2019.

22 12. On August 1, 2019, investigators established surveillance in order to locate
23 the vehicle that the CS had described. That day, at approximately 6:45 p.m.,
24 investigators observed a 2008 blue Silverado traveling westbound on Highway 8. Law
25 enforcement observed the Silverado traveling 10 to 15 miles above the speed limit. They
26 stopped the Silverado for the traffic violation just outside the city limits of McCleary, in
27

28 ¹ GARCIA-VALENZUELA and ESPINOZA-ARMENTA are charged in *United States v. GARCIA-VALENZUELA, et al.*, cause no. CR19-5209-RJB, with Conspiracy to Distribute Heroin and Distribution of Heroin.

1 Grays Harbor County, Washington. The driver identified himself to law enforcement as
2 LUIS MORENO-LUNA, and the passenger identified himself as MANUEL FLORES-
3 ESTRADA. Approximately ten minutes after the stop, a Washington-certified K-9 was
4 deployed on the vehicle.² The K-9 handler advised investigators that the K-9 positively
5 alerted to the presence of narcotics, specifically, on the passenger side near the cab of the
6 pickup.

7 13. While being read his *Miranda* warnings in Spanish, MORENO-LUNA
8 became angry at the officer. After the *Miranda* warnings, MORENO-LUNA stated to a
9 Grays Harbor Sheriff Deputy that he was going to kill the deputy and his family.
10 MORENO-LUNA also made statements about wanting to be deported back to his
11 country, of Mexico, so that he could live free again.

12 14. FLORES-ESTRADA was read his *Miranda* warnings in Spanish, and he
13 acknowledged and waived the warnings. After the warnings, FLORES-ESTRADA stated
14 that investigators would locate narcotics inside the passenger door of the Silverado, and it
15 would be wrapped in blue, grey, and brown tape. FLORES-ESTRADA stated that
16 MORENO-LUNA was responsible for the transportation of the narcotics. FLORES-
17 ESTRADA provided investigators with his phone number, which ended in 1610.

18 15. Investigators applied for and were granted a state search warrant for the
19 Silverado. During a subsequent execution of the search warrant, investigators seized
20 1,795 gross grams of suspected heroin and 1,185 gross grams of suspected
21 methamphetamine hidden inside the passenger door panel of the Silverado. The
22 suspected narcotics were wrapped in tape as FLORES-ESTRADA had described. The
23 narcotics field-tested positive for heroin and methamphetamine, respectively. Based
24 upon my training and experience, I know that these quantities of heroin and
25

26 ² PSD K-9 Pax is certified by the Washington State Criminal Justice Training commission (CJTC) and the California
27 Narcotics Canine Association (CNCA) as a Narcotics Detection Dog. PSD Pax was certified on June 27, 2018. The
28 certification processes included numerous searches for the narcotics; recognition of physical and mental reaction of
the canine; and interpretation of reactions displayed by the canine. Pax alerts after detecting the scent of controlled
substances for which he has been trained. His alert consists of physical and mental reactions, which include a
heightened emotional state. His final indication will result in his sitting or laying down.

1 methamphetamine are consistent with distribution quantities, not personal use. Even
2 taking into account the estimated weight of the packaging, there was more than one
3 kilogram of heroin, and more than 500 grams of methamphetamine (mixture) in the
4 Silverado.

5 16. In the Silverado, law enforcement also found proof of insurance cards
6 under the names of LUIS MORENO-LUNA and MANUEL FLORES-ESTRADA.

7 **CONCLUSION**

8 17. Based on the foregoing, I respectfully submit that there is probable cause to
9 believe that on August 1, 2019, MORENO-LUNA and FLORES-ESTRADA knowingly
10 possessed with intent to distribute, and aided and abetted the possession of with intent to
11 distribute, controlled substances, specifically, heroin and methamphetamine, all in
12 violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title
13 18, United States Code, Section 2.

14 DATED this 5th day of August, 2019.

15
16
17 
18 COLIN FINE, Complainant
19 Special Agent, DEA

20
21 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
22 presence, the Court hereby finds that there is probable cause to believe the Defendants
23 committed the offense set forth in the Complaint.

24
25 
26 HON. DAVID W. CHRISTEL
27 United States Magistrate Judge
28